

Before the
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of:)	
)	
Amendment of Part 97 of the Commission's)	RM-11306
)	
Rules Governing the Amateur Radio Services)	

Comments in Support of RM-11306

By

James E. Corenman KE6RK

1. BACKGROUND AND INTRODUCTION

I have been a radio amateur for more than 40 years, have a BSEE degree in engineering and computer science, and have spent most of my professional career in computing for medical applications. I have been involved in the development of software for digital communication modes on the HF bands since 1993 and am the author of the Airmail software (www.airmail2000.com) which has been used with the Winlink system for the last 10 years. I am also a co-founder of Sailmail (www.sailmail.com) which provides digital email service on the marine bands. I have connected to various marine and amateur digital stations around the world as a maritime mobile, and am very familiar with the issues involved with spectrum allocation.

2. DISCUSSION

There are no simple answers when it comes to spectrum allocation, but I think the ARRL proposal strikes the best possible compromise between flexibility and structure. I fully support this ARRL petition for rule making. The details of specific operating modes should not be written into Part 97, as that typically stifles future development. The goals of the amateur service are to embrace and foster new technologies, and to provide emergency communications

services when needed. These go hand-in-hand, and new technologies allow more efficient use of the available spectrum and more robust and reliable communications.

There is no one technology or signaling mode that will serve all needs, and there is no mode that won't be replaced by something better at some point in the future. Rather than allocating the available spectrum to specific modes by rules set in concrete, it provides much greater flexibility and efficiency to allocate spectrum by bandwidth and let the amateur community organize the various modes by cooperation and voluntary agreement. As new modes evolve they can be accommodated gracefully, by mutual agreement. The ARRL proposal provides this flexibility.

3. SUMMARY

The history of amateur radio has always been one of experimentation, innovation and co-operation. The ARRL proposal provides the flexibility to continue this as new digital modes are developed, and I strongly urge its adoption.

Respectively submitted,
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